

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALTAGRACIA J. PEGUERO,)	
Plaintiff,)	Civil Action No. 05-10995-RCL
)	
v.)	
)	
AMERICAN EXPRESS COMPANY, and)	
HEALTHEXTRAS, INC.,)	
Defendants.)	
)	

ASSENTED TO MOTION TO CONTINUE
HEARING ON MOTION FOR PROTECTIVE ORDERS

The Plaintiff, Altagracia J. Peguero, with the assent of all parties, hereby moves that the hearing on Defendants' Motion for Protective Order currently scheduled for December 4, 2006 at 2:00 p.m. be rescheduled to December 13, 2006 at 2:00 p.m.

AS GROUNDS IN SUPPORT of this Motion, the Plaintiff states as follows:

1. Plaintiff's counsel is scheduled to be conducting a deposition of an out-of-state defendant physician in a medical malpractice case on December 4, 2006. Given the physician's schedule and need to travel and the number of attorneys involved, it would be extremely difficult to reschedule the deposition.

2. All parties have assented to this motion and are available on or after December 13, 2006 for the hearing on the motions for protective orders.

WHEREFORE, the Plaintiff, Altagracia J. Peguero, respectfully requests that the hearing on the Defendants' Motions for Protective Orders currently scheduled for December 4, 2006 be continued until December 13, 2006 at 2:00 p.m.

THE PLAINTIFF,
Altagracia J. Peguero,
By her Attorney,

THE DEFENDANT,
AMERICAN EXPRESS COMPANY,
By their attorney,

/s/ Kevin Donius
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THE DEFENDANT,
HEALTH EXTRAS, INC.,
By their attorney,

/s/ Donald R. Pinto, Jr.
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Boston, MA 02111
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Dated: November 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing

(NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

/s/ Kevin Donius
Kevin Donius, Esquire